



JAMES R. MORRIS, VICE PRESIDENT

Duke Energy Carolinas, LLC
Catawba Nuclear Station
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York, SC 29745

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February 5, 2009

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

Subject: Duke Energy Carolinas, LLC (Duke)
Catawba Nuclear Station, Unit 2
Docket Number 50-414
Proposed Technical Specifications (TS) Amendment
TS 5.5.9, "Steam Generator (SG) Program"
TS 5.6.8, "Steam Generator (SG) Tube Inspection
Report"

Reference: Letter from Duke to NRC, same subject, dated
November 13, 2008

The reference letter requested an amendment to Catawba Facility Operating License NPF-52 and the subject TS. The amendment request proposed a one-cycle revision to the subject TS to incorporate an Interim Alternate Repair Criterion (IARC) in the provisions for SG tube repair criteria during the End of Cycle 16 Refueling Outage and subsequent Cycle 17 operation. This change is supported by Westinghouse Electric Company LLC, LTR-CDME-08-11, Rev. 3, "Interim Alternate Repair Criterion (ARC) for Cracks in the Lower Region of the Tubesheet Expansion Zone", and LTR-CDME-08-43, Rev. 3, "Response to NRC Request for Additional Information Relating to LTR-CDME-08-11, Rev. 3, P-Attachment".

On February 2, 2009, a Request for Additional Information (RAI) was electronically transmitted from the NRC to Duke regarding the reference amendment request. The purpose of this letter is to respond to this RAI. Our response is contained in the attachment to this letter.

The original regulatory and environmental analyses supporting the amendment request are not impacted by this RAI response.

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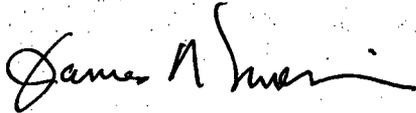
February 5, 2009

There are no new NRC commitments contained in this letter or its attachment.

Pursuant to 10 CFR 50.91, a copy of this letter and its attachment is being sent to the designated official of the State of South Carolina.

Inquiries on this matter should be directed to L.J. Rudy at (803) 701-3084.

Very truly yours,

A handwritten signature in cursive script, appearing to read "James R. Morris".

James R. Morris

LJR/s

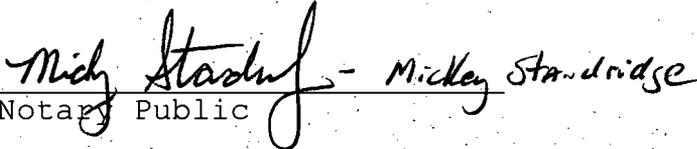
Attachment

February 5, 2009

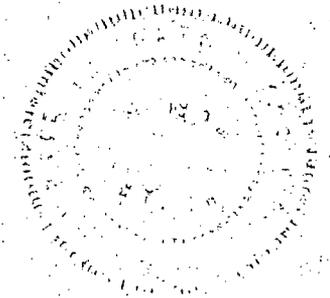
James R. Morris affirms that he is the person who subscribed his name to the foregoing statement, and that all the matters and facts set forth herein are true and correct to the best of his knowledge.


James R. Morris, Vice President

Subscribed and sworn to me: 2-5-2009
Date


Notary Public

My commission expires: 7-10-2012
Date



SEAL

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xc (with attachment):

L.A. Reyes

U.S. Nuclear Regulatory Commission

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ATTACHMENT

RESPONSE TO NRC REQUEST FOR ADDITIONAL INFORMATION

REQUEST FOR ADDITIONAL INFORMATION
RELATING TO STEAM GENERATOR TUBESHEET
AMENDMENT ON INTERIM ALTERNATE REPAIR CRITERIA

CATAWBA NUCLEAR STATION, UNIT 2

The NRC staff has the following request for additional information related to your submittal:

1. On page 14 of Attachment 1 to the November 13, 2008, letter, you state that a ratio [a leakage factor ratio] of 2.5 will be used for both the condition monitoring (CM) and the operational assessment (OA) upon implementation of the interim alternate repair criteria (IARC). In a public meeting held on January 9, 2009 (summary located in ADAMS under Accession No. ML090140510), Westinghouse presented revised information on how leakage factor ratios should be calculated. This revision may have an impact on the leakage factor ratio that is used at Catawba Nuclear Station, Unit 2. If so, please provide an update to the calculated leakage factor ratio and the calculation used to support the new leakage factor ratio.

Note: The leakage factor ratio used for Catawba Nuclear Station, Unit 2 needs to be submitted with the license amendment request as a formal regulatory commitment.

Duke Response:

In a public meeting held on January 9, 2009 at the NEI offices in Washington, D.C., an updated leakage factor analysis was presented and provided to the NRC staff in Westinghouse letter LTR-SGMP-09-2 (proprietary and non-proprietary), together with the appropriate Affidavit for Withholding. The most recent analysis concludes that a leakage factor of 2 is bounding for all plants considered candidates for the IARC and the permanent H*. Therefore, the factor of 2.5 contained in the technical support document for the IARC (which was previously licensed by the NRC) conservatively bounds the justifiable leakage factor for all normal operating and design basis accident conditions contained in the current licensing basis for Catawba Unit 2. Based on the most current analysis results, no additional action is required, since Duke has already proposed a leakage factor ratio of 2.5 as a license condition in our November 13, 2008 letter.